

Appendix B

*Excerpts of Blake Springhetti
Deposition Transcript,
October 3, 2024*

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

NORTH CAROLINA STATE)
CONFERENCE OF THE NAACP,)
ET AL.,)
Plaintiffs,)
vs.)

VIDEOTAPED DEPOSITION OF BLAKE V. SPRINGHETTI
Thursday, October 3, 2024

Videotaped Deposition of BLAKE V. SPRINGHETTI, called for examination under the Federal Rules of Civil Procedure, taken before me, the undersigned, Lori Litvin, a Notary Public in and for the State of Ohio, at the offices of Thompson Hine, LLP, Columbus, Ohio, commencing at 9:22 a.m.

1 Q Were you told to use traditional redistricting
2 principles when drawing the House map?

3 A No. I was -- I was told to comply with these
4 pieces and the guidance.

5 Q And you don't interpret the guidance or anything
6 in the guidance to mean traditional redistricting
7 principles because you have never heard that term
8 before?

9 A It's not my term or definition. I don't -- I
10 can't be really inside his head on what he meant by
11 that but he could have meant something. I don't know.

12 MS. MOLODANOF: Okay. We're
13 going to look at a map. We're going
14 to mark this as Exhibit 7.

15 MR. SHENTON: We're on 7.

16 MS. MOLODANOF: 7, great. Okay.

17 We are going to mark this as
18 Exhibit 7.

19 - - - - -

20 (Springhetti Exhibit 7 was marked
21 for identification.)

22 - - - - -

23 Q It is a map that was created on DRA using shape
24 files produced by your counsel from you. The date of
25 the map or the date from the shape file is September

1 28th, 2023 and it's called Guilford Version 2.

2 So, again, this was -- this is a map that was
3 created from your data but it's not necessarily the
4 map itself. This is in a PDF that you produced, but
5 does this look familiar?

6 Go ahead and take some time. You can take some
7 time to look at it if there's --

8 I think my first question is going to be does
9 this sound like or look like the map, the first draft
10 of the map, that you had prepared at the end of
11 September in preparation for your meeting with
12 Representative Hall and Representative Stevens?

13 A I mean, that would be around the time line when I
14 would have brought another product, yeah.

15 Q Okay. Do you remember saving a file called
16 Guilford V2?

17 A Not specifically, but certainly could have.

18 Q Do you know why it would be named Guilford?

19 A Probably because that's the only area in this map
20 that changed from a previous version.

21 Q Do you recall saving a previous version of the
22 map before this date?

23 A I don't know if I -- well, there would have been
24 because this would have been the second -- this would
25 have been the second or third meeting so I would have

1 had something else probably.

2 Q So you think that before this map there was a
3 full draft prepared? So, the time stamp for this, and
4 this is based on the shape files that we have from
5 you, is 6:15 p.m. on September 28th, 2023.

6 A Yeah. I wouldn't have had -- I don't think I had
7 a completed plan before this so I think this is --
8 this probably was one of those situations that I
9 mentioned before where I came with two -- two variants
10 of an area.

11 Q Say that one more time.

12 A So, like I said earlier, later in the process
13 sometimes I would come with like two -- two versions
14 of the same map where it's identical everywhere but
15 one area where I saw one option or two options, but
16 this could have been one of those situations.

17 Q So based on the naming Guilford V2, does it sound
18 like there was a Guilford V1 and you may have brought
19 two versions to -- to North Carolina for your meeting
20 with the representatives and this was the version that
21 was chosen?

22 A That, or this was just my second take at Guilford
23 and this is just the version that I brought, one of
24 those. I mean, one of those two things likely.

25 Q But you're not sure?

1 A No. I don't remember.

2 Q Okay. Do the districts on here look familiar to
3 you?

4 A Yeah. A lot of them, yeah. Yeah. I mean, this
5 looks pretty familiar.

6 Q Anything that looks off?

7 A Yeah. I'm assuming that this is substantially
8 similar, someone else created, but you're saying it's
9 based on my file so I'm going to assume that that's
10 true and that this is the same but without --
11 without -- without going through, you know, all of the
12 districts -- I mean, we can do that if you want but it
13 looks pretty similar, yeah.

14 Q I'm representing that -- that this map and other
15 maps from DRA that we're going to show you are solely
16 based on information that we received from your
17 counsel that consisted of your shape files and no
18 other --

19 A Sure.

20 Q -- data --

21 A Well --

22 Q -- unless -- unless I tell you otherwise.

23 A Right. Yeah. I mean, my -- yeah. My only thing
24 is, you know, I don't know if the geographical data is
25 the exact same in Dave's Redistricting as it is in

1 Maptitude because I have seen where -- but -- but that
2 would be minor, okay, so I'm going to assume that this
3 is what that -- what you're saying it is.

4 Q Okay. So, so, you understand this to be a
5 version of the first full map that you drafted?

6 A Yeah. This looks to be a version of work
7 product.

8 Q And this was a version that you drafted in Ohio
9 at your personal computer?

10 A It's hard to say. I mean, I was -- you know,
11 during the months of August, September, and October I
12 was spending a lot of time in North Carolina so I
13 can't say that this was all completed in Columbus or
14 not but --

15 Q Do any of these areas stick out as areas where
16 you were provided specific feedback during your
17 meetings in North Carolina with Representatives Hall
18 and Stevens?

19 A No, not specifically. I mean, when I would --
20 when I would come in town we would -- we would look at
21 the full plan.

22 Q Okay. And I'm going to put another map in front
23 of you and put a couple just to show you what we have
24 based on -- you can keep it -- to show you what we
25 have based on the data that was provided on your

1 behalf to see if it helps refresh recollection.

2 MS. MOLODANO: So we will mark
3 as Exhibit Number 8, this is the same
4 date, it is September 28th, 2023
5 and it is called Meck V2. Same date,
6 slightly later in the day, 6:35 p.m.

7 - - - -

8 (Springhetti Exhibit 8 was marked
9 for identification.)

10 - - - -

11 Q So this is again created on DRA, Dave's
12 Redistricting App, and is based on the shape files
13 that were provided on your behalf, and it just has a
14 different title and a slightly different time.

15 Do you recognize the map? For the most part,
16 based on my review, it looks to be similar but I want
17 to ask if you -- let's start with do you recognize the
18 file name?

19 A Yeah.

20 Q And what do you recall about it?

21 A Similar to the last one, this was either
22 something where there was something slightly different
23 about Mecklenburg or it's just the variant that I
24 brought. I don't remember which.

25 Q You could have worked on Meck V1 and then updated

1 9. All right. This is dated October
2 9th, 2023 at 8:11 p.m.
3 - - - - -

4 (Springhetti Exhibit 9 was marked
5 for identification.)
6 - - - - -

7 Q And the name of it is money sign R85PEKP map.
8 I'm going to call it the money sign map so I don't
9 have to repeat myself, but that's the map for the
10 record.

11 Take a look. Does this map look familiar to you?

12 A The name doesn't seem familiar to me but I
13 don't -- that's not really how I name things but it
14 could just --

15 Q I was curious. So, that was one of my questions
16 was what's -- what is in the name?

17 A I'm not sure there but, I mean, it looks -- first
18 glance it looks pretty similar to the Exhibit 8.

19 Q Do you recall making this map or saving this
20 version of this map? And I will represent again that
21 this is a map from DRA but the name of the map, the
22 time stamp, the date, and all of the data used to show
23 what this map looks like is from shape files produced
24 by your counsel on behalf of you.

25 A Yeah, it looks -- again, first scan it looks

1 identical to Exhibit 8.

2 Q Take a look at Wake County. Do you see anything
3 different there? I'll point you to 30 -- to District
4 35. The Buffalo wing remains but there's a portion of
5 35 kind of towards the middle of the district as no
6 longer there and has been absorbed into another
7 district right below it.

8 Do you see that? We're going to focus on that
9 change.

10 A I'm not seeing any -- I mean, just -- I don't
11 have a microscope here but --

12 Q So if you look at 8, Exhibit 8, and you look at
13 35, I would call it like a pinky finger right in the
14 middle of the district going into the district right
15 below. The color of that district is green and then
16 in Exhibit 9 it's a lot smaller. It's not --

17 A Wow, okay.

18 Q Do you see that?

19 A Yeah, but that's -- that's quite the vision you
20 have there. Okay. All right.

21 Q Do you recall why that change was made?

22 A No. It looks to be pretty -- a minor adjustment
23 between the two districts. I mean, it's hard to even
24 make out that change looking at these two maps.

25 Q Do you have any sense of why that would have been

on the video record at 3:18.

Q Okay. We're going to turn to another map so I don't think you will need those anymore so you can set those aside. I will let you know if we need to pull them out again.

MS. MOLODANOV: This will be

Exhibit 11, Springhetti Exhibit 11.

— — — — —

(Springhetti Exhibit 11 was marked for identification.)

— — — — —

Q So this has the same date as the money sign map we looked at, October 9th, but it's slightly later in the day. It's dated 9:22 and it's called HDS005BAF. Does that file name look familiar to you?

A Yeah.

Q Yeah, okay. So this, again, was a map created in DRA by using the shape files produced by your counsel. What is your recollection of -- of this map?

A Looks pretty similar to the previous maps.

Q Do you spot any differences -- or, I guess, let me start with do you -- when you were working on this map do you recall making any changes to it based upon the prior map?

A Just looking at this full plan, I mean, I

1 of? Just the map itself?

2 A It was a block assignment file, shape file, and I
3 think that was it.

4 Q Okay. I'm going to show you the final enacted
5 map.

6 A Okay.

7 Q I guess in a moment. Let me -- let me first --
8 first do this one. So on this HDS005, this October
9 9th map, I'm going to show you a version of that that
10 was created in DRA that shows BVAP, black voting age
11 population, shaded across the entire State.

12 MS. MOLODANOF: And we will mark
13 this as Exhibit 13.

14 - - - - -

15 (Springhetti Exhibit 13 was marked
16 for identification.)

17 - - - - -

18 Q So I guess before you look at the map, have you
19 looked at any map for the House that shows BVAP
20 shading?

21 A No.

22 Q So this will be the first time you see anything
23 like this --

24 A Correct.

25 Q -- in North Carolina?

1 A Well, period. I have never looked at a --

2 Q You mean in terms of your experience in Ohio
3 redistricting?

4 A Yeah, I never used racial data in Ohio either.

5 Q So I'll just give you a -- give you a moment to
6 take a look at -- at this map. Do you have any
7 reactions?

8 A Nope.

9 Q I mean, what do you -- can you generally describe
10 what you see on the map in terms of the BVAP data
11 assuming that's what's on here is -- is accurate?

12 MR. STRACH: Objection.

13 Q So just to describe a little bit further, the
14 darker the shading the higher the percentage of black
15 voting age population and the lighter the shading the
16 lower the percentage of BVAP in the area.

17 Do you have any reactions to what this looks like
18 or areas of the map that have more BVAP or less that
19 you weren't aware of before?

20 MR. STRACH: Objection. Go

21 ahead.

22 A This is the first time I have seen this so I --
23 I'm not really sure what to make of it.

24 Q The first thing that pops out to me is that the
25 northeast has some of the highest percentage of BVAP.

1 Do you see that looking at Districts 27, 23, 5?

2 This is what we talked about earlier, what has
3 been termed the Black Belt area.

4 Based on your understanding of the partisan data
5 that you looked at, the election data that you looked
6 at, and you had said you had looked at that throughout
7 the process of your map drawing, right?

8 A Partisan data?

9 Q Hm-hmm.

10 A Yes.

11 Q Do you see on this map any correlation between
12 that partisan data that you looked at and BVAP?

13 MR. STRACH: Objection. You can

14 answer if you can.

15 A Again, I don't think I can make that comparison.
16 I didn't do this analysis.

17 Q Just based on looking at this analysis and what
18 it's showing, assuming that it's true that the darker
19 shaded areas have higher BVAP, given this and based
20 upon your experience drawing the House map and the
21 partisan data that you looked at, the political
22 performance that you looked at to create those
23 districts, do you see any correlation?

24 MR. STRACH: Same objection.

25 A Same answer. I didn't conduct this. I can't say

1 empirically that there is that correlation.

2 Q You don't see any correlation sitting here today
3 right now?

4 MR. STRACH: Same objection.

5 A I didn't complete this analysis so I don't know
6 if this is a correlation. I didn't use racial data so
7 I'm not sure.

8 Q If there was a correlation, would one way to
9 achieve certain demographic performance to target
10 political performance?

11 MR. STRACH: Objection.

12 A I can't make that assumption. I don't know what
13 this analysis is and I didn't use racial data so I
14 can't say one way or the other.

15 Q Hypothetically speaking, if there was a
16 correlation, this map accurately showed BVAP across
17 the State of North Carolina, would as a map drawer one
18 way to achieve a certain demographic performance be to
19 target political performance assuming that correlation
20 does exist?

21 MR. STRACH: Same objection.

22 A I can't make that assumption. I didn't use
23 racial data. I didn't complete this analysis. This
24 is the first time I'm seeing the analysis, so no.

25 Q So you said that you didn't look at race

1 A No.

2 Q Did you otherwise review anything else related to
3 this litigation besides the subpoena that you
4 received?

5 A No.

6 Q Okay. So we talked about a handful of maps, and
7 as I represented, those were the maps -- the DRA maps
8 were maps that we created by using shape-filed data
9 that was produced on your behalf in response to the
10 subpoena.

11 Is that your understanding?

12 A Yeah.

13 Q There were a handful of file names we walked
14 through, some that you recognized and some that you
15 didn't recognize.

16 But I want to ask whether there is any file names
17 that you recall during your map-drawing experience
18 that we did not talk about today?

19 A No.

20 Q When you received the subpoena, did you conduct
21 an internal search of your emails and documents to
22 figure out what you had saved and then you produced
23 those to your counsel?

24 A Yes.

25 Q And you produced everything that you understood

*Blake Springhetti Deposition,
October 3, 2024,
Exhibit 7*



DRA 2020

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Map Statistics Analyze Compare Advanced

